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Attorneys for Plaintiff
JEANETTE MOORE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JEANETTE MOORE,

Plaintiff,

v.

J & J WORLDWIDE SERVICES, a Texas
Corporation; and, DOES 1-10, inclusive,

Defendant.

Case No. 3:19-cv-06356-RS

**JOINT STIPULATION AND
ORDER EXTENDING DISCOVERY
CUTOFF AND RELATED DATES**

AS MODIFIED BY THE COURT

Complaint Filed: 07/17/2019
Action Removed: 10/04/2019
Trial Date: 05/03/2021

Pursuant to N.D. Cal. Local Rules 6-2 and 7-12, Defendant J & J WORLDWIDE SERVICES and Plaintiff JEANETTE MOORE (collectively the “Parties”) hereby stipulate and agree as follows:

1. WHEREAS, on January 9, 2020, the Court issued the Case Management Scheduling Order that that set September 28, 2020 as the deadline to complete all non-expert discovery to be completed by the Parties (Doc. 11);

2. WHEREAS, the Parties have been unable to complete discovery or otherwise prepare for trial due to the current circumstances related to the COVID-19 pandemic;

3. WHEREAS, the Parties believe that additional time is needed to conduct discovery, including taking depositions, and to prepare for trial;

4. WHEREAS, the Parties have not previously made a request to modify any dates set in the Case Management Scheduling Order;

5. WHEREAS, the Parties are discussing the possibility of alternative dispute resolution, which may further necessitate the continuance of the deadlines in the Case Management Scheduling Order;

6. WHEREAS, the Parties respectfully request that the deadline for non-expert discovery be continued and the remaining deadlines in the case be adjusted accordingly, as follows:

Event	Deadline from January 1, 2020 Order	Revised Deadline
Non-Expert Discovery cut-off:	9/28/2020	1/28/2021
Disclosure of identities and reports of expert witnesses:	10/12/2020	2/11/2021
Rebuttal expert reports:	10/26/2020	2/25/2021
Close of expert discovery:	11/09/2020	3/11/2021
Pretrial motion deadline:	2/4/2021	6/7/2021

Pretrial conference:	4/21/2021	8/25/2021
Trial date:	5/3/2021	9/7/2021

Dated: September 4, 2020

JACKSON LEWIS P.C.

By: 

Tyler A. Brown
Hardev S. Chhokar
Attorneys for Defendant
J & J WORLDWIDE SERVICES, INC.

Dated: September 4, 2020

BENJAMIN LAW GROUP, P.C.

By: 

Nail Benjamin
Kristin A. Smith
Attorneys for Plaintiff
JEANETTE MOORE

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: September 8, 2020



Hon. Richard Seeberg
United States District Judge

4820-6176-3272, v. 1